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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS RESPONSE TO
UBER'S AMENDED TRIAL BRIEF**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal its Response to Uber’s Amended Trial Brief. (“Waymo’s Administrative Motion”). Waymo’s
8 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Response to Uber’s Amended Trial Brief (“Waymo’s Response”)	Highlighted in green	Waymo

13 3. Portions of Waymo’s Response contain, discuss, or refer to Waymo’s confidential
14 business information, including descriptions of vendors that Waymo utilizes in developing its self-
15 driving car business. Specifically, portions of Waymo’s Response describe confidential business
16 information that fits squarely within this category because it contains Waymo’s vendor information,
17 the disclosure of which may provide competitors with an advantage in the market and would harm
18 Waymo. Public disclosure of this information to Waymo’s competitors would harm Waymo by
19 giving its competitors access to Waymo’s confidential business development of its self-driving car
20 systems. If such information were made public, I understand that Waymo’s competitive standing
21 would be significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
22 information.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on January 27,
3 2018.
4

5 By /s/ Lindsay Cooper
6 Lindsay Cooper
7 Attorneys for WAYMO LLC

8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Lindsay Cooper.

11 /s/ Charles K. Verhoeven
12 Charles K. Verhoeven
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